

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

Civil Action Number 2:23-cv-00048

SPECTRUM WT, et al.,)

Plaintiffs,)

vs.)

WALTER WENDLER, et al.,)

Defendants.)

REMOTE VIDEOTAPED DEPOSITION

BARRETT BRIGHT

FRIDAY, DECEMBER 19, 2025

Reported by:

Rebecca Callow, RMR, CRR, RPR

Job No. BB121925

1
2 REMOTE VIDEOTAPED DEPOSITION OF
3 BARRETT BRIGHT, produced as a witness at the
4 instance of the Plaintiffs and duly sworn, was taken
5 in the above-styled and numbered cause on the
6 19th day of December, 2025, from 10:03 a.m. to
7 3:22 p.m., before Rebecca J. Callow, Texas CSR-8925,
8 Registered Merit Reporter, Certified Realtime
9 Reporter, Registered Professional Reporter and
10 Notary Public for the State of Florida, reported by
11 computerized stenotype machine via Zoom
12 videoconference pursuant to the Federal Rules of
13 Civil Procedure.

APPEARANCES

FOR PLAINTIFFS:

FOUNDATION FOR INDIVIDUAL RIGHTS AND EXPRESSION

501 Walnut Street

Suite 900

Philadelphia, Pennsylvania 19106

(215) 717-3473

By: Mr. J.T. Morris

jt.morris@fire.org

Mr. Adam B. Steinbaugh

FOR DEFENDANTS:

OFFICE OF THE ATTORNEY GENERAL - STATE OF TEXAS

P.O. Box 12548 (MC-009)

Austin, Texas 78711

(512) 463-2120

By: Ms. Alexia Baker

alexia.baker@oag.texas.gov

Mr. David Bryant

ALSO PRESENT:

Mr. Brian Christopher, Videographer

Mr. Marc Rietvelt, Texas A&M General Counsel

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BARRETT BRIGHT,

called as a witness herein, having
been first duly sworn by a Notary Public,
was examined and testified as follows:

EXAMINATION

BY MS. BAKER:

Q. Where are you joining us from?

A. I'm joining y'all from Madison, Wisconsin.

Q. Okay. Well, my name is Alexia Baker. I
represent defendants Walter Wendler and Chris Thomas
in this litigation, and I'll be deposing you today.

So before I get into the questions, I'm
just going to go over some basic rules to ensure that
today's deposition flows as seamlessly as possible.

Do you understand that you are
testifying under oath today and that you're legally
obligated to tell the truth?

A. I understand.

Q. You must provide verbal responses to my
questions, so no head nodding or anything like that.
This is particularly important because we are on
Zoom. Does that make sense?

A. Yes. I understand.

1 BY MS. BAKER:

2 Q. How long did you meet with an attorney?

3 A. For about an hour-ish.

4 Q. Are you accompanied by legal counsel at
5 your location?

6 A. No, I am not.

7 Q. Did you speak with any non-attorneys to
8 prepare for the deposition?

9 A. No, I did not.

10 Q. Have you been deposed before?

11 A. No, I have not.

12 Q. Have you ever testified in court?

13 A. No, I have not.

14 Q. Do you intend to testify in this case's
15 trial?

16 A. Yes.

17 Q. Have you ever been a party to a lawsuit,
18 aside from this action?

19 A. No. This is my first lawsuit.

20 Q. Okay. So I am about to proceed to the next
21 set of questions, but I'm just going to clarify a
22 few terms to ensure that we are completely on the
23 same page.

24 I am going to use the term "WT" or "the
25 university" to refer to West Texas A&M University.

1 Does that make sense?

2 A. Yes, it does.

3 Q. Whenever you hear me use the term
4 "communication" or any derivative of that word, I'm
5 speaking of any and all exchanges of information,
6 any dialogues, discussions, text messages, social
7 media posting, or messages, interviews and such.

8 Does that make sense?

9 A. Yes.

10 Q. I will mention "A Fool's Drag Race," or
11 "the 2023 drag show" to refer to the drag show that
12 Spectrum WT planned to host on WT's campus in 2023.

13 Does that make sense?

14 A. Yes.

15 Q. When I mention "the Sam Houston drag show,"
16 I'm referring to the off-campus drag show that
17 Spectrum WT hosted in 2023. Do you understand?

18 A. Yes, I do.

19 Q. And, finally, when I mention "Don't Be a
20 Drag" drag show, or "the 2024 drag show," I'm
21 referring to the drag show that Spectrum WT planned
22 to host on campus in 2024. Does that make sense?

23 A. Yes, it does.

24 Q. So I'm interested to hear a little bit more
25 about you and your background, so please state your

1 full name for the record.

2 A. May name is Barrett Alexander Bright.

3 Q. Do you have any aliases?

4 A. I also go by "Bear."

5 Q. What is your date of birth?

6 A. January 14th, 2002.

7 Q. Where were you born?

8 A. Houston, Texas.

9 Q. Where were you raised?

10 A. Border, Texas.

11 Q. What part of Texas is that?

12 A. It is in the panhandle, about an hour north
13 of Amarillo.

14 Q. What is your highest level of educational
15 attainment?

16 A. I have graduated with my bachelor's, and
17 I'm currently in grad school.

18 Q. What degree did you receive for your
19 undergraduate education?

20 A. A bachelor's of science in civil
21 engineering.

22 Q. And what are you in graduate school
23 studying?

24 A. I'm getting my master's in civil
25 engineering with a focus on structural.

1 A. Yes, I did.

2 Q. And you maintained your participation in
3 that scholarship program throughout the duration of
4 your time at WT?

5 A. Well, it wasn't a scholarship program; it
6 was an honors program. And, yes, I did.

7 Q. An honors program. Okay.

8 Aside from Spectrum WT, were you
9 involved with any other student organizations?

10 A. Yes. I was involved with ASCE student
11 chapter at West Texas A&M.

12 Q. What does "ASCE" stand for?

13 A. American Society for Civil Engineers.

14 Q. And you graduated from WT. Correct?

15 A. Correct.

16 Q. When did you graduate?

17 A. May of 2024.

18 Q. When you graduated, did you wear, like, any
19 special graduation stoles reflecting your membership
20 in Spectrum, or any of the other orgs that you were
21 involved?

22 A. I did have -- it wasn't a stole; it was
23 like a braided cord for ASCE. And I did receive a
24 stole, not for -- or through Spectrum but through
25 Buff Allies.

1 Q. Is that a rainbow stole?

2 A. That is correct.

3 Q. Okay. Do you have any mental or physical
4 disabilities?

5 A. No, I do not have.

6 Q. Are you currently under a doctor's care for
7 anything?

8 A. No.

9 I do have a prescription for PrEP.

10 Q. So I'm curious about your involvement in
11 Spectrum while you were at WT. When did you first
12 get engaged with Spectrum?

13 A. It was during the fall of 2020. I -- I
14 don't remember how exactly I got into contact with
15 them.

16 I do know that I started attending
17 their meetings and enjoyed the meetings at the club,
18 and decided to join.

19 Q. So you would say you joined because you
20 found a sense of community within the organization?

21 A. That is correct.

22 Q. When did you become president of Spectrum?

23 A. That was in the fall of 2022.

24 Q. Were you elected to your role?

25 A. Yes, I was.

1 **Q. How did you meet Marcus Stovall?**

2 A. I met Marcus during a -- Join the Heard, a
3 student org event, where new students come in and
4 see all the student orgs on campus.

5 He stopped by our table and asked if
6 we were LGBTQ friendly. We said yes, and he started
7 joining our meetings after that.

8 **Q. And what -- how would you describe your**
9 **duties as president?**

10 A. I would describe them as leading the
11 officer corps, ensuring that we put on events that
12 are helpful to the LGBTQ community and outreach
13 programs -- outreach out there for LGBTQ+ students
14 and allied members, and -- as well as create a place
15 that is -- feels safe and belonging to LGBTQ members
16 of the WT campus.

17 **Q. So you mentioned part of the**
18 **organization's -- I'm sorry.**

19 You mentioned part of your role was
20 creating events that would help the LGBTQ+ community.
21 **Is that correct?**

22 A. Yes.

23 **Q. What do you mean by that?**

24 A. We would put on charity events; we would
25 help post outreach programs, like coming out day

1 events type of thing, to show engagement and
2 involvement on campus.

3 Q. In your observation as the president of
4 Spectrum, did you have a lot of upper classmen
5 members, underclassmen, or was it kind of just a mix
6 of both?

7 A. I would describe it as a mix.

8 Q. Would you say that you knew all of the
9 members well, or were you constantly seeing new
10 faces at events?

11 A. We would have repeat members who would come
12 in every -- at every event, and we'd have a few new
13 faces every once in a while for certain events.

14 Q. So a few new faces every once in a while
15 would show up?

16 A. Um-hmm.

17 Q. Do you recall how many members Spectrum had
18 when you first became president of the organization?

19 A. I would not be able to recall that number.

20 Q. Do you -- would you agree that Spectrum's
21 membership increased under your leadership?

22 A. I believe so. Yes.

23 Q. And Dr. Kristina Drumheller was the
24 organization's faculty advisor. Correct?

25 A. That is correct.

1 Q. Was she the faculty advisor throughout the
2 duration of your presidency?

3 A. Yes.

4 Q. And what role did she play as Spectrum's
5 faculty advisor?

6 A. As a sort of support and helpline where we
7 would be able to ask her questions and get help with
8 navigating the university systems, as well as
9 financial help dealing with the banks.

10 Q. So you were the main -- would you say that
11 you were the main officer who was interacting with
12 her, or were there others too?

13 A. There were others. All the officers were
14 able to meet with her, if they needed to, for
15 anything.

16 I know a few of them did meet with her
17 without me being involved, and I have also met with
18 her without them being involved.

19 Q. Chip Chandler was involved with Spectrum
20 too. Right?

21 A. That is correct.

22 Q. In what capacity?

23 A. Chip Chandler was one of the leaders of
24 Buff Allies while I was president, which is the
25 faculty LGBTQ+ support group. And so we would be in

1 contact with him for some of the same reasons as
2 Kristina Drumheller. But we would also, as just
3 another, like, outreach-type thing for support with
4 Buff Allies specifically.

5 Q. So Buff Allies offered support to Spectrum.
6 Is that correct?

7 A. Yes.

8 Q. How did Buff Allies support Spectrum?

9 A. Buff Allies would allow us to use their
10 table and table decorations for tabling events, as
11 well as help provide rides for when we did the
12 Palo Duro Canyon hike.

13 Q. Would they offer any financial support to
14 you-all?

15 A. Not as an organization.

16 Q. But as individuals?

17 Would individuals within the
18 organization offer financial support?

19 A. They did during the GoFundMe fundraising
20 for the 2023 drag show at Sam Houston Park.

21 Q. And Spectrum participated in on-campus
22 activities like student org fairs. Right?

23 A. That is correct.

24 Q. What did you do during those student org
25 fairs?

1 A. The student org fair was a way for student
2 orgs to get reregistered with the university every
3 year and so --

4 Q. So you had to --

5 I'm sorry. Go on.

6 A. I lost my train of thought.

7 Q. You were saying the student org fairs were
8 something that student organizations had to
9 participate to register with the university.
10 Correct?

11 A. That is correct.

12 Q. Would you say that participating in those
13 student org fairs was a way for the organization to
14 recruit new members?

15 A. No.

16 Q. What was the benefit, aside from it being
17 mandatory, of participating in the student org fair?

18 A. To make sure that all of your documents and
19 all of the risk requirements were completed before,
20 so your org could be reregistered.

21 Q. So the student org fair wasn't necessarily
22 a tabling-type event; it's more about actual
23 completing registration forms. Is that right?

24 A. That is correct.

25 Q. Were there any events or programs that

1 you-all participated in that allowed you to recruit
2 and interface with members of the campus community
3 and tell them about what Spectrum does and their
4 mission and values?

5 A. Yes. That would be the Join the Herd
6 student org thing. I can't remember the exact term.
7 It was called Join the Herd, and that would be part
8 of new student orientation.

9 Q. New student orientation. And that's
10 something that happens on a yearly basis. Right?

11 A. That is correct.

12 Q. Or did it happen -- did it happen each
13 semester?

14 A. I can't remember.

15 I know specifically it always happened
16 in the fall.

17 Q. And Spectrum participated in new student
18 orientation while you were the president. Correct?

19 A. That is correct.

20 Q. After the controversy surrounding the drag
21 show events that Spectrum wanted to host on campus,
22 did you-all continue to participate in the new
23 student orientation?

24 A. That is correct.

25 Q. What was the main method through which

1 **Spectrum recruited new members?**

2 A. It was mainly through new student
3 orientation.

4 **Q. Where did Spectrum typically hold its**
5 **meetings?**

6 A. We typically held our meetings in the
7 Classroom Center.

8 **Q. Where is that on campus?**

9 I don't have a map in front of me, but
10 how would you describe that?

11 A. I would describe the Classroom Center as
12 being near the Buffalo fountain, near the
13 central-ish part of campus and attached to the JBK.

14 **Q. And you met as an organization on a weekly**
15 **basis. Right?**

16 A. That is correct.

17 **Q. And why was it important to meet on a**
18 **weekly basis?**

19 A. It allowed us to touch base with members,
20 propose and talk about upcoming events, and plan for
21 future fundraising possibilities.

22 **Q. And in your view, what was Spectrum's**
23 **primary mission?**

24 A. Spectrum's primary mission was to help and
25 support LGBTQ+ members and other students on campus,

as well as do outreach with the campus community.

Q. And with that outreach, you -- Spectrum collaborated with a lot of other student organizations. Right?

A. That is correct.

Q. In what way would you collaborate with other student organizations?

A. We would help cohost or support other student org's events, as well as, like, split up certain tasks for other events. And, finally, we would also table -- sort of. It's not truly tabling; it was more like we would table with items that were free for said event.

Q. So if you -- if Spectrum collaborated with another student organization for an event, would it typically be the case that they would use their social media accounts to promote Spectrum's events and you-all might use your social media accounts to promote that org's event? Is that how that would work?

A. Yes.

Q. And would you say collaborating with other student organizations allowed Spectrum to reach members of the campus community that might not otherwise come to Spectrum events?

1 A. That is correct.

2 MS. BAKER: I'm going to
3 introduce what I'll call Exhibit 1. This
4 is the constitution of Spectrum, and it is
5 marked SPECTRUM 2220.

6 (Deposition Exhibit 1
7 marked for identification.)

8 BY MS. BAKER:

9 Q. Do you recognize this document, Barrett?

10 A. Yes.

11 Q. What is this document?

12 A. This document is the constitution of
13 Spectrum WT.

14 Q. And this is a governing document for the
15 organization. Right?

16 A. That is correct.

17 Q. And you're somewhat familiar with its
18 provisions. Right?

19 A. That is correct.

20 Q. So I'm going to zero in on Article II
21 entitled "Purpose." The first line reads:

22 "The purpose of this organization is to
23 promote diversity support and acceptance on campus,
24 and in the surrounding community."

25 How, in your opinion, did Spectrum

1 promote acceptance on campus?

2 A. That would be through our tabling events
3 for outreach, and through our collaboration with
4 other student organizations.

5 Q. And how did the organization understand the
6 term "acceptance" as it is used in this document to
7 mean?

8 A. More so in the sense of tolerance. As in
9 people know that we exist and that we are here, and
10 that we were also students of West Texas A&M
11 University.

12 Q. And according to this provision, another
13 one of Spectrum's goals is to educate members of the
14 WT community about LGBTQ+ issues. Correct?

15 A. That is correct.

16 Q. What are some platforms of how Spectrum WT
17 educated members of the WT community concerning
18 these issues?

19 A. We had a National Coming Out Day panel that
20 we were part of that helped show light to LGBTQ+
21 issues on campus, as well as the queer history
22 nights that we hosted.

23 Q. Would you say that there are resources and
24 support for members of the LGBTQ+ community at WT?

25 A. Yes.

1 was sufficiently accepting such that you would be
2 willing to work with them?

3 A. That would be either they are already an
4 LGBTQ+ support group, like PASO, or like the Trevor
5 Project; or in the case of the Ukrainian Bakery
6 service project. The president at that time,
7 London Hughes, contacted her at that time and
8 confirmed with her that she was accepting of LGBTQ+
9 community people.

10 Q. So sometimes you could determine whether
11 that organization was accepting by just simply
12 asking them. Right?

13 A. That is correct.

14 Q. And you would look at the kinds of
15 activities that they were involved with. Right?

16 A. That is correct.

17 MS. BAKER: I'm going to
18 introduce as Exhibit 2, a document called
19 SPECTRUM 565, is the WT Campus
20 Organizations Handbook.

21 (Deposition Exhibit 2
22 marked for identification.)

23 BY MS. BAKER:

24 Q. So, Bear, while you were president,
25 Spectrum was a registered student organization. Is

1 **that correct?**

2 A. That is correct.

3 Q. And what does it mean to be a registered
4 student organization?

5 A. As a registered student organization, the
6 student org will have access to WT campus venues to
7 host events, as well as apply for their support
8 programs to student orgs.

9 Q. Are you familiar with this handbook?

10 A. I am familiar of it.

11 Q. So you don't recall reading its provisions?

12 A. I don't remember what are in the
13 provisions.

14 Q. To your knowledge, is this a legal
15 document?

16 MR. MORRIS: Objection. Calls
17 for a legal conclusion.

18 BY MS. BAKER:

19 Q. Is this something that was available to
20 students?

21 A. That is correct.

22 Q. So I want to draw your attention to the
23 section entitled "Privileges."

24 The second bullet under that section
25 says: "Access to Campus Organization Funds,"

1 **Leadership. Do you have any recollection of what**
2 **that office is and how they help students?**

3 A. I know that outside of the student orgs, if
4 you had a -- what's it called? -- an emergency that
5 has happened, that -- like, your laptop broke, you
6 could apply for an emergency loan that you didn't
7 have to pay back, so it wasn't really a loan, from
8 the Office of Student Engagement and Leadership.
9 And they would help you with funds to procure broken
10 items, or if you had, like, your family member in
11 the hospital, they would help you with how to
12 navigate classes, and et cetera.

13 **Q. Did Spectrum ever work with that office in**
14 **any way?**

15 A. Not that I can recall.

16 **Q. Was there any office or department at the**
17 **university that Spectrum worked with?**

18 A. Yes.

19 We worked with the JBK help staff for
20 helping set up events and rent venues, as well as --
21 I can't remember her name. She might have been with
22 the Office of Student Engagement and Leadership.
23 She would help us with our poster requests and
24 printouts for banners.

25 **Q. I'm going to keep scrolling down to another**

1 A. I do not know the university policy on the
2 accepting or refusing of requests to host an event.

3 BY MS. BAKER:

4 Q. The first section of this chart indicates
5 that the university will have to keep certain
6 reservations on hold to ensure that there are no
7 other conflicting events in the space that a student
8 is seeking. Correct?

9 A. Yes. That is correct.

10 Q. And according to this chart, after a
11 tentative confirmation has been sent, a group can
12 start advertising for their event. Correct?

13 A. That is what the document says. Yes.

14 Q. And after the event details are confirmed
15 and the event receives a confirmed status, a student
16 group could still receive emails concerning the
17 status of the event after the fact. Correct?

18 MR. MORRIS: Objection.

19 Mischaracterizes the document.

20 A. I would say, based off of this document,
21 that it -- they would be able to give updates or
22 questions regarding the event that the staff may
23 have.

24 BY MS. BAKER:

25 Q. So you were -- so you agree that there

1 Q. And is the individual identified on this
2 page the person whom you followed as president? Did
3 you take leadership from this individual?

4 A. Yes. I took leadership from London Hughes
5 before I became president.

6 Q. So I'm going to keep scrolling down here to
7 the table of contents. And it appears to me that
8 this page lists out some events that Spectrum has
9 historically had. Is that correct?

10 A. As far as I know, yes.

11 Q. Were any of those events on -- let me
12 rephrase.

13 Did Spectrum host any of the events
14 under this list called "The Gay Calendar"?

15 A. Are you referring to my -- under my time as
16 leadership?

17 Q. Yes.

18 A. Yes.

19 Q. Which events?

20 A. We did the National Coming Out Day. We
21 helped with PASO Turnabout. We have done bake
22 sales. And it wasn't under my leadership. It was
23 when I was under London's leadership. We also did a
24 Halloween party, a Holi"gay" Party and The Gay Prom.

25 Q. The PASO Turnabout, what is that?

1 A. That is a fundraising event for PASO,
2 Panhandle AIDS Support Organization, where they run
3 a charity drag show to raise funds.

4 Q. And would you agree that these events
5 helped members of WT's LGBTQ+ community feel welcome
6 and accepted on campus. Right?

7 A. I would say for most of these events, yes.
8 PASO was more of a charity event, and
9 it was not hosted on campus.

10 Q. But most of these events occurred on
11 campus. Correct?

12 A. That is correct.

13 Q. Did any of these events take place in the
14 JBK Student Center?

15 A. Yes.

16 Q. Which ones?

17 A. That would be the bake sale and the
18 National Coming Out Day.

19 Q. And the National Coming Out Day, what was
20 that like?

21 A. So we would -- as Spectrum, we would host
22 different events on National Coming Out Day. One
23 was -- you could get, like, your headshot taken with
24 the "I'm gay," "I'm lesbian," "I'm queer," like,
25 sticker attached to it, like as if it was a Polaroid

1 type of photo.

2 And the other one we worked with, I
3 believe, Buff Allies. And that was for, like, the
4 National Coming Out Day panel and party.

5 Q. So would you agree -- excuse me.

6 Would you agree that several Spectrum
7 events took place in the JBK student center while you
8 were president?

9 A. Yes. I would agree.

10 Q. And at these events, Spectrum was able to
11 table and interact with students. Correct?

12 A. Yes. That's correct.

13 Q. Would you agree that tabling was a good way
14 for Spectrum to recruit new members and gauge
15 students' interest in the organization and its
16 mission?

17 A. I would say yes.

18 Q. I'm going to now scroll down to page 13 of
19 this document. I guess there is a faster way of
20 doing this.

21 Okay. This section entitled "Drag
22 Queen." It says: We tend to go with Ivy Tran for
23 all things drag queen. She's great."

24 I'm not going to read the rest of that.

25 Are you familiar with Ivy Tran?

1 A. Not about that event, I do not believe.

2 MS. BAKER: I'm going to stop
3 sharing.

4 BY MS. BAKER:

5 Q. Spectrum started planning its 2023 drag
6 show in 2022. Right?

7 A. That's correct.

8 Q. Who came up with the idea?

9 A. That would be me. I came up with the idea.

10 Q. And why was it important in your mind that
11 the event would be a drag show?

12 A. I believed it would be important, because
13 drag shows are, like, inherently a part of LGBTQ+,
14 like, culture. And it would be a great way for
15 showing LGBTQ+ support on campus by hosting the
16 student drag show, as well as raising money for a
17 charity project, which is what our members wanted to
18 see a little bit more of.

19 Q. You just mentioned that drag shows are
20 inherently a part of LGBTQ+ culture. What do you
21 mean by that?

22 A. That as far as I was raised and informed of
23 LGBTQ+ and gay culture before I realized I was gay
24 and I immersed myself inside the culture, it was --
25 it, kind of, started with Marsha P. Johnson and,

1 like, Stonewall, and she was a trans woman. But it
2 was like that idea with drag being kind of, like, a
3 counterculture movement to standard straightness, if
4 that makes sense.

5 Q. So would you say that your perspective of
6 drag changed once you became immersed in the culture
7 of it, as you -- as you mentioned?

8 A. I didn't know much about drag until after I
9 realized I was gay and started looking stuff up that
10 dealt with gay culture.

11 Q. Do you ever -- do you believe that there's
12 ever a time when drag is not inherently -- or is not
13 a part of LGBTQ+ culture?

14 A. I would say that I don't really know about
15 that. I could take a guess, but I don't think that
16 would be very accurate.

17 Q. Do you agree that there could be people who
18 dress in drag or perform drag in a way to ridicule
19 members of the LGBTQ community?

20 A. This would also be speculation, but I am
21 sure there probably are.

22 Q. But it's your opinion that drag is
23 inseparable from the LGBTQ community. Is that what
24 you believe?

25 MR. MORRIS: Objection.

1 Mischaracterizes prior testimony.

2 A. I believe that drag is a very important
3 part of LGBTQ+ culture.

4 I'm not sure about what the greater
5 community thinks about it being separated from
6 LGBTQ+ culture.

7 BY MS. BAKER:

8 **Q. Concerning the 2023 drag show and in**
9 **planning it, what was the message of the show?**

10 A. The message of the show was -- well, it
11 depends on each of the performers' own personal
12 message, because they are performing on stage and
13 they all have their own ideas of what they want to
14 say.

15 But the overall purpose of the show
16 was to show support for the LGBTQ+ students on
17 campus and to raise funds for The Trevor Project.

18 **Q. So there was a message that the individual**
19 **performers are trying to convey. Correct?**

20 A. Yes. That's correct.

21 **Q. And there's also -- are you saying there's**
22 **also a collective message as well?**

23 A. I would say that the collective message of
24 the drag show was to -- like I said, to show support
25 for the LGBTQ+ community and as a way to, like, mess

1 with and bend gender norms, as well as raise money
2 for The Trevor Project.

3 Q. So if the message is determined by what the
4 performer is trying to convey, how does the audience
5 know what's in the performer's mind? What --

6 MR. MORRIS: Objection. Calls
7 for speculation.

8 I'm sorry, Ms. Baker. Finish
9 your question.

10 MS. BAKER: Let me rephrase.

11 BY MS. BAKER:

12 Q. Have you ever been to a drag show?

13 A. Yes, I have.

14 Q. And it's your view that those individual
15 performers have a unique message that they're trying
16 to convey. Is that correct?

17 A. Yes.

18 Q. How do you, as a member of the audience
19 viewing a drag performer, know what message they are
20 trying to convey?

21 A. That's kind of hard to answer. It's kind
22 of like saying you're looking at an art piece and
23 you're saying what did the artist intend with this.
24 And sometimes it's hard to tell. I know that --

25 Q. So just --

1 A. Oh, sorry.

2 MR. MORRIS: Go ahead and finish.

3 Let Mr. Bright finish his answer.

4 A. I have seen drag shows where one person's
5 message was, kind of, like TV and the idea of
6 communication being distorted, and they had really
7 big blocky hair and it was colored as if it was a TV
8 screen. And I have seen others that was a
9 performance to Taylor Swift with backup dancers, and
10 that one was more of, like, breaking gender norms.

11 But I can't specifically say exactly
12 what was going through their head while they're were
13 performing.

14 BY MS. BAKER:

15 **Q. Why the JBK?**

16 A. The JBK would allow Spectrum a large enough
17 venue on campus to be able to put on an event. We
18 would have been able to, like, control, in a sense,
19 who was coming in because we had the age requirement
20 with parental consent.

21 It was -- we were going to be able and
22 allowed to use it for the sense of the student org
23 funds allowing us to host it at the JBK, and it's
24 quite central. So it would allow a lot of campus to
25 easily be able to reach it.

1 **Q. Were there any alternative venues**
2 **considered in the planning process?**

3 A. We also considered a -- the alumni banquet
4 hall room. We were worried that it might be a bit
5 too small. And that was also on campus.

6 And we also considered -- what's it
7 called? -- one of the spaces in the VHAC, the Virgil
8 Henson Activity Center. I don't remember what it
9 was called at the Virgil Henson Activity Center.

10 **Q. And you worked -- you worked very closely**
11 **with Dr. Shawn Fouts during the reservation process.**
12 **Correct?**

13 A. I believe so. Yes.

14 **Q. How would you describe the reservation**
15 **process?**

16 A. It starts with requesting the space and the
17 name of the event that you would like to use it for.
18 And then you would need to fill out a hazard matrix
19 and request in that -- or the -- what's it called?
20 It's been a bit. I'm trying to remember the terms
21 of the documents.

22 The hazard matrix and the risk
23 request -- or not "request" -- the risk form.

24 And then once you've submitted that
25 and are -- or get tentative approval, you can start

1 marketing. And then you would start sending in
2 posters and poster designs for approval, and cement
3 any other final documents, like the food request
4 form, the catering exemption form, and, I guess,
5 anything else required by the JBK before you get
6 full confirmation.

7 **Q. And all the marketing materials have to**
8 **receive university approval. Right?**

9 **A. Based on what the university requires, yes.**

10 **Q. So how does that work? Spectrum creates a**
11 **document, a flier, and then what happens?**

12 **A. So specifically with the 2023 drag show, we**
13 **were working with a bunch of other orgs, and another**
14 **org was handling the marketing side. So they**
15 **forwarded their poster ideas to us and we forwarded**
16 **it to the JBK.**

17 **And then the JBK went through those**
18 **documents, the posters, and then they said that some**
19 **of these documents are -- some of these posters have**
20 **kind of risky looking, like, injury-prone type of**
21 **activities, like doing the splits, and that we**
22 **weren't allowed to have those type of images on our**
23 **poster, and sent them back to us. And we started**
24 **the review/rework process.**

25 **Q. What is the review/rework process?**

1 A. Are you referring to the -- is it the
2 questionnaire, answer, response things?

3 Q. Yes. Yes.

4 A. Yes. I do recognize those.

5 Q. And at what -- at which point in the
6 process would you have completed this? At the very
7 beginning or toward the end?

8 A. This would be near the beginning with the
9 risk form.

10 Q. So here under the estimated attendance, you
11 indicated that you expected up to 100 or even more
12 attendees. Correct?

13 A. That is correct.

14 Q. Had Spectrum ever had an event with that
15 many people?

16 A. Not in the past, as far as I remember.

17 Q. So why so -- why so many -- why did you
18 expect so many people to be there?

19 A. We were overestimating the amount of
20 people, just in case.

21 But we were also promoting it to,
22 like, family members of performers and the greater
23 LGBTQ+ population outside of WT.

24 Q. And this form also says "All ages are
25 welcome, 18 and under with a guardian." Correct?

1 A. Yes.

2 Q. So only minors with a parent or guardian
3 present could attend. Right?

4 A. That is correct.

5 Q. And part of this form indicates that there
6 were event or activity waivers. Correct?

7 A. Yes. That would be correct.

8 Q. And what were these waivers?

9 A. They would have been a waiver release form
10 in case -- if you got injured while performing.

11 Q. And who created those forms?

12 A. We never finished those forms. The event
13 got canceled before we could print them out.

14 Q. But you --

15 A. I believe you were going -- oh, sorry.

16 Q. I was just going to ask whether Spectrum
17 would have created those forms.

18 A. We had asked Drumheller what we needed to
19 do about that. And Drumheller, I believe, directed
20 us to -- oh, my gosh. I can't remember.

21 It was some type of site, and we would
22 have either typed them up ourselves for the purpose
23 of risk release, or it was -- we would ask the JBK
24 what type of risk release. I can't remember which
25 one it was, though.

1 Q. So a 17-year-old would have had to be
2 accompanied by a parent or guardian to attend this
3 event. Correct?

4 A. Correct.

5 Q. And how did Spectrum plan to confirm
6 whether attendees were truly accompanied by a parent
7 and not someone else, like a neighbor or friend?

8 A. Well, we would have checked IDs at the
9 door.

10 However, I am not too sure how we
11 would have reacted to the situation you have
12 mentioned.

13 Q. So if a 17-year-old student is
14 unaccompanied by a parent or guardian, they just
15 wouldn't be able to attend this event. Right?

16 A. I don't believe they would have been able
17 to attend the event.

18 Q. While you were at -- while you were a
19 student at WT, did you ever meet any other students
20 whose families lived far away?

21 A. Yes. I have met a lot of students whose
22 families lived far away.

23 Q. So, potentially, some students wouldn't be
24 able to be there --

25 A. I need to correct something. I know -- I'm

1 not sure if we've mentioned it yet.

2 We were also checking student IDs at
3 the door, besides just, like, regular legal IDs.
4 And I know that the student org at Spectrum talked
5 with Drumheller about allowing university students
6 with -- access with their student ID. But I'm not
7 sure if that has been brought up on any of the
8 documents.

9 Q. So you're saying that all the student
10 needed was their student ID to get in? Is that a
11 what you're explaining?

12 A. Yes.

13 And then if you were a nonstudent, you
14 would have needed your legal guardian with you if
15 you were a minor.

16 Q. So if you were a student, you didn't need
17 to be accompanied by a parent or guardian. Right?

18 A. That is correct, if you had your WT student
19 ID.

20 Q. Why did -- why did Spectrum create -- why
21 did Spectrum decide to limit the event -- why did
22 Spectrum decide to require minors to attend with
23 parents or guardian?

24 A. That would be within the realm of, like,
25 context.

1 At that time, there was a lot of
2 outrage nationwide -- or not really outrage. There
3 was a lot of news coverage nationwide about drag
4 shows. And -- as such, and we were worried that we
5 would cause either a large protest or cancellation
6 if we didn't set requirements that restricted minors
7 from attending the event.

8 Q. So Spectrum -- was Spectrum instructed to
9 do that by -- hold on.

10 (Pause in proceedings.)

11 BY MS. BAKER:

12 Q. Was Spectrum instructed to do that by
13 administrators, or did it make that decision on its
14 own?

15 A. We -- it made that decision on its own to
16 be extra cautious.

17 Q. Now, this form also says that you
18 identified the event or activity as posing a risk of
19 impairment, humiliation, coercion, physical assault,
20 et cetera. Right?

21 A. Yes, initially. And then the JBK informed
22 us that it wasn't -- it didn't -- it wasn't in that
23 realm of risk.

24 Q. Why did you say "yes"?

25 A. Once again, we were being extra cautious

1 because -- we were worried, being in a fairly
2 conservative area, about, like, protests and angry
3 people trying to shut down the event; a much bigger
4 risk than we thought was actually there.

5 Q. So you were concerned about the risk to the
6 performers. Correct?

7 A. Yes.

8 Q. And you were concerned that the performers
9 may feel embarrassed or harassed from other students
10 after the event. Correct?

11 A. Yes.

12 Q. Did you ever consider whether attendees or
13 other students would feel embarrassed or harassed by
14 the event?

15 A. No.

16 Q. I'm going to -- here at the top of the
17 page, it says -- there's a question asking whether
18 minors are specifically invited to attend the
19 activity. What does "specifically invited" mean?

20 A. I interpreted that as if we reached out to
21 them and they wanted to come.

22 Like my siblings. I reached out to
23 them and asked if they wanted to come, and they said
24 yes. And so that was my personal belief of that's
25 what it was asking. I'm not too sure if it was

1 referring to something else.

2 Q. Are you aware of any other events that have
3 happened in Legacy Hall that were limited to
4 individuals 18 and above?

5 A. I do not know the name of the events.

6 I do know that there have been events
7 where alcohol has been served in Legacy Hall, and
8 those were restricted to 18 and up.

9 Q. Would you agree, in your dealings with
10 Dr. Shawn Fouts during the reservation process, that
11 he was concerned about risk that the drag show may
12 pose to minors during that process?

13 A. He did not inform me of risk imposed to
14 minors during that time.

15 Q. I am going to scroll up in this document
16 marked SPECTRUM 788.

17 Have you ever seen this email
18 communication at all?

19 A. I believe I have seen this.

20 Q. And this is from Dr. Shawn Fouts. Correct?

21 A. Yes.

22 Q. And here, he's asking whether participants
23 need to get prior approval for their dress and
24 performance before the event. Correct?

25 A. Yes. That is what he is asking.

1 Q. And he also asked whether the event is
2 going to need any warning labels concerning minors.
3 Correct?

4 A. That is what he's asking. Yes.

5 Q. And as part of the reservation process, you
6 also had to complete a separate risk assessment
7 form. Right?

8 A. Are you referring to the hazard matrix?

9 Q. Yes.

10 A. Yes.

11 Q. What is -- is there a distinction between
12 the hazard matrix and the risk assessment?

13 MR. MORRIS: Objection to the
14 extent it calls for speculation.

15 A. I know there is a physical difference with
16 the hazard matrix where there -- you were labeling
17 how risky your event will be on a scale, but I don't
18 know about any other differences between the two
19 documents. I don't remember any difference -- any
20 other differences between the two documents.

21 MS. BAKER: I am going to
22 introduce Exhibit 6.

23 MR. MORRIS: Ms. Baker, before we
24 do that, we've been going for almost an
25 hour and a half. Can we take a break?

1 MS. BAKER: Sure. How long of a
2 break do y'all need?

3 MR. MORRIS: Five, ten minutes.
4 Whatever works for you.

5 MS. BAKER: Okay. Let's do ten
6 minutes.

7 MR. MORRIS: Okay. Come back at
8 11:40.

9 MS. BAKER: Sounds good.

10 (Off record: 11:29 a.m. to 11:44 a.m.)

11 MS. BAKER: So Exhibit 6 is the
12 WT risk management and insurance matrix,
13 marked SPECTRUM 776.

14 (Deposition Exhibit 6
15 marked for identification.)

16 BY MS. BAKER:

17 **Q. You completed this form. Correct, Barrett?**

18 **A. Yes. That is correct.**

19 **Q. And what exactly is this document?**

20 **A. This document is the West Texas A&M**
21 **University Risk Management and Insurance Matrix.**

22 **Q. And which part of the res- -- during which**
23 **part of the reservation process would you have**
24 **completed this form?**

25 **A. Near the beginning.**

1 Q. Concerning the drag race, you mention
2 "performing in drag, possible bad press."

3 What do you mean by "bad press"?

4 A. That was where we, as Spectrum, was worried
5 about, like, large negative protests on campus
6 against the show.

7 Q. Against the show.

8 What -- what gave you reason to believe
9 that those protests would be against the show?

10 A. Because, at the time, there was a lot of
11 news coverage about drag shows and a lot of protests
12 against those drag shows nationwide, from what I
13 remember. And so that made us, as Spectrum, worried
14 that that might happen at our drag show.

15 Q. And the method to manage the risk -- let me
16 zoom in -- is not allowing minors entry without a
17 legal guardian. How does that help to manage the
18 risk of possible bad press?

19 A. That would be because a lot of the news
20 coverage we saw about the drag stuff was the drag
21 reading at libraries and people worried about their
22 kids seeing drag. And so we thought the best way to
23 mitigate that risk was to -- as best as we can --
24 reduce the number of minors at the show.

25 Q. Now, earlier, you mentioned that you have

1 **siblings. Right?**

2 A. That is correct.

3 **Q. Are those younger or older?**

4 A. Younger siblings.

5 **Q. Younger siblings. How old would they have**
6 **been around the time that all this was going on that**
7 **you would have completed this form?**

8 A. I believe around in the range between,
9 like, 12 and 16-ish.

10 **Q. So you would have wanted this to be an**
11 **event that they could attend. Right?**

12 A. That is correct.

13 **Q. Now, you have identified the performing in**
14 **drag, possible bad press, and the possible**
15 **protestors as being medium risk -- well, actually,**
16 **strike that. I misspoke.**

17 **The drag race, performing in drag,**
18 **possible bad press is identified as medium risk.**

19 **Correct?**

20 A. Yes. That is correct.

21 **Q. And the possible protestors is identified**
22 **as being low risk. Correct?**

23 A. That is correct.

24 **Q. Why did you say possible protestors was a**
25 **low-risk concern?**

1 A. If I remember right, this was while
2 consulting with either Drumheller or the JBK help
3 desk what I needed to put for that. And I was
4 recommended to place it at low risk.

5 Q. And then what about the possible bad press,
6 medium risk? Were you filling that out under --
7 with the assistance of your advisor as well?

8 A. That, I do not remember.
9 I might have had that already filled
10 out by the time I went for help.

11 Q. Now, on that other form we looked at a
12 little bit earlier, you also identified
13 embarrassment, humiliation, coercion, and physical
14 assault as potential risks. Right?

15 A. Um-hmm.

16 Q. And why -- why doesn't that appear on this
17 form?

18 A. I believe that fell under the "performing
19 in drag" section.

20 Q. Do you remember how you planned to
21 alleviate the risk posed by the embarrassment, the
22 humiliation, and coercion? How did you plan to
23 mitigate that risk?

24 A. We informed the performers that there --
25 that might be a risk involved when performing. And

1 that we would use the drag and stage names, and not
2 use real names during the performance.

3 Q. So the stage names are what the drag
4 performers create themselves. Right?

5 A. That is correct.

6 Q. And everybody gets to create their own
7 stage name.

8 A. That is correct.

9 MS. BAKER: I am going to ...

10 (Pause in proceedings.)

11 BY MS. BAKER:

12 Q. Excuse me. My mistake. I was looking at
13 the wrong page.

14 So who was going to participate in the
15 2023 drag show?

16 MR. MORRIS: Objection.

17 Ambiguous.

18 A. From what I can remember, it was going to
19 be me, Marcus, Henry, and there were a few -- Kim.
20 And there were a few others. I can't remember their
21 names at the moment.

22 But I do know --

23 BY MS. BAKER:

24 Q. So was it --

25 A. -- we submitted -- oh. Sorry.

1 I do know that we submitted a list of
2 the performers and their stage names to the JBK.

3 Q. So was this an event that members of the
4 public could participate in as performers, or only
5 students?

6 A. The main purpose was for student
7 performers.

8 However, we did have available the
9 option for either the judges of the drag show or the
10 emcee to perform a number.

11 Q. So the emcee could perform?

12 A. If needed. Yes.

13 Q. What do you mean by "if needed"?

14 A. If we did not have enough student
15 performers to fill out the time slots.

16 Q. So if everything with the 2023 drag show
17 had gone -- proceeded as Spectrum initially planned,
18 would there have been only student performers, or
19 would there have been additional performers,
20 nonstudents?

21 A. There was -- there would have been only
22 been student performers.

23 Q. Were there any judges for the performance?

24 A. Yes. There were some people we had reached
25 out to be judges.

1 Q. Who were those people?

2 A. You had -- we had drag queens from the
3 local Amarillo area, like -- oh, my gosh. What's
4 their name? Van Buren -- Valentine Van Buren. And
5 I can't remember who we asked to be the other judge.

6 Q. So you asked local drag queens to be judges
7 for the on-campus show. Correct?

8 A. That is correct.

9 Q. Why?

10 A. Who better to judge a drag race than drag
11 queens themselves.

12 Q. Did you define any criteria that they would
13 use in judging student participants?

14 A. We were going to have a planned list
15 dealing with makeup, character creation, like,
16 design of their clothes. And then it was floated to
17 have, like, a questionnaire to ask -- for all the
18 performers to answer in character.

19 Q. Can you discuss that questionnaire?

20 A. It would have been along the lines of like
21 a beauty pageant style of the questions. Like, what
22 do you plan to do in the future, this, that,
23 et cetera.

24 Q. And would the judges select a winner?

25 A. That is correct.

1 Q. Would there be one winner?

2 A. I believe so. That was the initial plan.

3 Q. And would each of the judges have a vote?

4 How would they go about selecting the
5 winner?

6 A. We hadn't decided on that just yet.

7 I believe we were going to leave it up
8 to the judges.

9 Q. And can you describe those categories that
10 the judges were going to consider again?

11 A. It was going to be the performance, like
12 makeup, clothing design, and, like, how well they
13 created the character they're performing as.

14 Q. And can you explain what you mean when you
15 say "the character they're performing as"?

16 A. Sure. Some performances will have, like, a
17 character who is like, quote, unquote, crazy
18 obsessed type of personality. And so showing that
19 obsession in the performance would be part of, like,
20 that character creation.

21 Other performances are more about,
22 like, elegance. And so showing off, like, elegance
23 in the performance would be part of the character
24 creation.

25 So you'd -- during the questions,

1 asking when you're asking in character -- or
2 responding in character. There would be, like,
3 moments where, does this person respond in the way
4 that they're presenting their character to be?

5 Q. So the performer -- the performer decides
6 who their character is, and then the judges evaluate
7 whether that performer is sufficiently embodying
8 that character. Right?

9 A. Um-hmm -- yes.

10 Q. So what kinds of characters have you seen?

11 A. Like I mentioned, there was the crazy
12 obsessed. The, like, super-elegant, almost like
13 royalty style of drag queen. I've seen, like, goth
14 punk style of characters, and I've also seen like
15 raunchy comedic characters.

16 MS. BAKER: Let's go off the
17 record for a moment. I'm having
18 notification issues here. I don't want it
19 to disrupt me from being able to hear.

20 (Pause in proceedings.)

21 MS. BAKER: I'm going to
22 introduce Exhibit 7, marked SPECTRUM 829.

23 (Deposition Exhibit 7
24 marked for identification.)

25 BY MS. BAKER:

1 the judges.

2 Q. And the drag queens were going to be the
3 judges. Correct?

4 A. Yes.

5 And Myss Myka was going to be the
6 emcee.

7 Q. So Lindsey Adams -- Lindsey Adams is a drag
8 queen?

9 A. Yes, I believe.

10 I do know when Chip sent me this, I
11 did not know the names of these drag queens that
12 were going to judge. Those were on Chip's side.

13 Q. So he suggested these drag queens.
14 Correct?

15 A. As the ones to judge. Yes.

16 Q. At that time, were you looking for judges?

17 A. I believe this is -- I think this was after
18 the cancellation. So we were going to have them,
19 possibly, as judges, and then this might lead to --
20 to our referenced conversations that are
21 attorney-client priveleged.

22 Q. Chip Chandler recommended Lindsey Adams and
23 Azariah as potential judges for the on-campus drag
24 show. Right?

25 A. I believe so. Yes.

1 Q. Were you familiar with Lindsay Adams or
2 Azariah?

3 A. I believe that I recognize those names; I
4 just can't put the faces to the names.

5 Q. So you don't recall whether, at -- at that
6 time, during the planning process, whether you were
7 already familiar with them?

8 A. I don't remember about Lindsey Adams. I
9 have seen Azariah before.

10 Q. You've seen Azariah in drag performance?

11 A. That is correct.

12 Q. And when Chip Chandler recommended these
13 performers, did you have any alternatives in mind?

14 A. I don't remember, at the time, if we were
15 set on those two being judges, or if we had
16 alternatives that we had asked that we were waiting
17 on responses for. I don't fully remember.

18 Q. And Myss Myka was going to emcee. Right?

19 A. That is correct.

20 Q. And did Chip recommended Myss Myka to be
21 the emcee as well?

22 A. I believe so.

23 Q. So at some point in the planning process,
24 did you have a conversation with Chip and ask him to
25 help identify local drag performers who might be

1 willing to help?

2 A. That is correct.

3 Q. Was the participation of these local drag
4 queens identified in the risk assessment anywhere?

5 A. I don't believe so.

6 Q. Was the participation of local drag queens
7 something that the JBK center staff was aware of at
8 any point?

9 A. I do believe so. Yes.

10 Q. What is the basis of your belief?

11 A. I remember talking with both Chip and --
12 with both Chip and Dr. Drumheller about this as part
13 of the process. And then I remember confirming with
14 them -- oh. I'm sorry. Give me a moment. I'm
15 wracking my brain.

16 Maybe not confirming. I remember
17 confirming that we were going to have local drag
18 queens at the show with them in total. And I don't
19 believe I ever sent an email out to the JBK about
20 them.

21 However, I do believe I remember
22 having a conversation with the help desk about them
23 being -- emceeing and judging.

24 Q. Did you have a conversation with Dr. Shawn
25 Fouts about them emceeing and judging?

1 in planning this event?

2 A. That is correct. I did have to complete
3 that.

4 MS. BAKER: I'm going to
5 introduce as Exhibit 8 an email which is
6 stamped SPECTRUM 860.

7 (Deposition Exhibit 8
8 marked for identification.)

9 BY MS. BAKER:

10 Q. Once I pull this up, I will give you a
11 moment to read the email in its entirety.

12 (Document review.)

13 A. All right. I've read the email.

14 BY MS. BAKER:

15 Q. You and Dr. Fouts communicated a lot during
16 the reservation process. Right?

17 A. That is correct.

18 Q. Would you say that you-all had -- you and
19 Dr. Fouts had a pretty positive working relationship
20 throughout this process?

21 A. I would believe so. Yes.

22 Q. Now, in this email, he mentions on -- in
23 the second paragraph on the second line, he asks
24 that Spectrum send us the music to make sure it is
25 not on a prohibited JBK playlist.

1 **What is the prohibited JBK playlist?**

2 A. I do not know what the prohibited JBK
3 playlist is.

4 **Q. Would you agree that in this email**
5 **Dr. Fouts is asking you to send him music for JBK to**
6 **review in advance of the performance?**

7 A. Yes. I would agree that that is what he's
8 asking.

9 **Q. But you don't know what the prohibited JBK**
10 **playlist is. Correct?**

11 A. That is correct.

12 My guess is it would be music that the
13 JBK has already marked as not allowed to be played.

14 **Q. Are you familiar with any policies or rules**
15 **that the JBK center has concerning acceptable music**
16 **lyrics at all?**

17 A. No. I do not have any knowledge of what
18 they deem as acceptable or not.

19 **Q. So in your -- in your knowledge of working**
20 **with the JBK center, they have to approve music for**
21 **events. Is that accurate?**

22 A. As far as I can tell, yes.

23 **Q. Did anything in your dealings with**
24 **Dr. Fouts lead you to believe that your event could**
25 **move forward if it had music on the prohibited**

1 A. This was prepared after the event was
2 designated PG-13.

3 Q. And had this flier been approved by the
4 JBK, where would Spectrum post it? Where does it
5 usually post its fliers?

6 MR. MORRIS: Objection.

7 Compound.

8 BY MS. BAKER:

9 Q. Where does Spectrum typically post its
10 fliers on campus?

11 A. That would be in the campus -- or as many
12 campus buildings as we can.

13 Most often it will be on the JBK.
14 There are a lot of spots to place student org
15 posters there. And then in the specific college
16 buildings, they have designated spots to put posters
17 for campus events.

18 MS. BAKER: So I would like to
19 take a look at another poster; the
20 finalized poster. I will mark as
21 Exhibit 10, the flyer labeled Def 843.

22 (Deposition Exhibit 10
23 marked for identification.)

24 BY MS. BAKER:

25 Q. This was the official flier for the 2023

1 drag show. Right?

2 A. Yes.

3 Q. Is there any mention of minors on the
4 flyer?

5 A. No, there are not.

6 Q. It does say that it's PG-13. Right?

7 A. That is correct.

8 Q. In your experience and your knowledge of
9 the PG-13 rating, do minors typically need a parent
10 or guardian to be present to attend a PG-13 movie?

11 A. As long as they are above the age of 13,
12 they do not require one, based off of my knowledge.

13 Q. And this event -- this poster also says
14 that the event was sponsored by several different
15 organizations. Right?

16 A. That is correct.

17 Q. What exactly does a sponsor do?

18 A. The sponsors were the ones who helped set
19 up, create, and form the event.

20 So that was including FlrstGen, RHA,
21 us, Buff Allies, and K-Pop.

22 Q. Do the sponsors share any of the costs that
23 are associated with putting the event together?

24 A. I believe spectrum was the one who would
25 handle the costs for the event.

1 Q. And as far as you're aware, these
2 organizations promoted the event. Right?

3 A. That's correct.

4 Q. And that helps to draw a wider audience of
5 students. Right?

6 A. That is correct.

7 Q. And Spectrum wanted to draw a large
8 audience of students. Right?

9 A. That is correct.

10 Q. And individuals who were planning to
11 purchase tickets, how would they do that?

12 A. They could either use the QR code to go to
13 the website that we -- event space -- event -- I
14 can't remember its name.

15 But it would go to the website and
16 they would could purchase tickets there, or they
17 could purchase tickets at the door.

18 Q. And are you aware, or do you recall, anyone
19 purchasing a lot of tickets at once?

20 A. I -- oh.

21 MR. MORRIS: Objection.

22 Go ahead.

23 A. I remember there was someone who bought, I
24 believe, a table of tickets. But I don't remember
25 their name or how much that was at the time.

1 BY MS. BAKER:

2 Q. Do you remember any other individuals
3 purchasing a table?

4 A. I do not remember.

5 Q. So I'd like to discuss President Wendler's
6 decision in 2023 to not -- to prohibit the 2023 drag
7 show from going forward in Legacy Hall.

8 After President Wendler's decision, did
9 he speak to you personally?

10 A. No, he did not.

11 Q. Did you speak with any WT staff or
12 administrators concerning the decision?

13 A. I remember speaking to -- I believe it was
14 the vice chancellor of student affairs where he
15 informed me of the cancellation decision.

16 Q. Was that Chris Thomas who you spoke with?

17 A. Yes.

18 Q. And do you remember what Chris Thomas said
19 during that conversation?

20 A. This was before the email went out.

21 But he informed me that Dr. Wendler
22 was canceling the drag show. And when I asked him
23 why, he said that Dr. Wendler believes that the drag
24 show is degrading towards women and that's why he
25 canceled it.

1 Q. Did you have any conversation with
2 Dr. Thomas about finding an alternative venue for
3 the event?

4 A. No, I did not.

5 Q. Do you recall at any point Dr. Thomas
6 offering to help cover any expenses associated with
7 finding an alternative venue?

8 A. I believe he mentioned along the lines of
9 offering support for Spectrum for the event that
10 happened, but not for finding an alternative venue.

11 Q. What do you mean by "the event that
12 happened"?

13 A. Or that got canceled.

14 Because we mentioned, like, the cost
15 for printing fliers and the -- like, fees for
16 Eventbrite -- that was the name of the ticket
17 site -- and I believe he said that he would be open
18 to helping Spectrum with those fees, but I don't
19 remember exactly.

20 Q. And he said he would be open to helping
21 them -- helping Spectrum with those fees?

22 A. Yes. But the fees --

23 Q. After --

24 A. -- after the cancellation. Yes.

25 Q. So Dr. Thomas said he was willing to help

1 cover the Eventbrite fees after the event had been
2 canceled?

3 A. I don't believe it was specifically the
4 Eventbrite fees; it was just, like, the printing
5 fees through the university. But then we didn't get
6 charged for the printing fees.

7 MS. BAKER: I'd like to introduce
8 as Exhibit 11 a document marked
9 SPECTRUM 1261.

10 (Deposition Exhibit 11
11 marked for identification.)

12 BY MS. BAKER:

13 Q. Were you at all involved in this
14 conversation?

15 Let me let you read it.

16 (Document review.)

17 A. All right.

18 Oh --

19 BY MS. BAKER:

20 Q. Sorry. I didn't start from the top.

21 (Document review.)

22 A. All right.

23 BY MS. BAKER:

24 Q. Do you know what this conversation was
25 about?

1 A. This was after the cancellation notice went
2 out, and I believe it was when we were in the middle
3 of doing the turnaround to find an alternative
4 campus to still host a charity drag show. And we
5 were talking with Chris and a few of the other
6 advisors for the orgs we were working with, and
7 Buff Allies, to see what we could do about -- in
8 setting of a plan to be able to put on the drag show
9 still.

10 Q. So who is this -- do you know who this
11 Chris she's mentioning?

12 A. I don't remember. I think that's -- that
13 might be Chris Thomas.

14 Q. And to clarify, you said he offered to pay
15 for the printing of the fliers before Spectrum moved
16 to an alternative venue. Correct?

17 A. Correct.

18 Q. Shortly after -- shortly after
19 President Wendler released his statement, Spectrum
20 created a GoFundMe account. Right?

21 A. I wouldn't say immediately after. I think
22 it took a little bit of time, but yes.

23 MS. BAKER: I'd like to introduce
24 as Exhibit 12 a document marked
25 SPECTRUM 1443.

(Deposition Exhibit 12

marked for identification.)

BY MS. BAKER:

Q. Is this Spectrum's Instagram page?

A. I believe so. Yes.

Q. And it's dated March 25th, 2023. Correct?

A. Yes.

**Q. And that's just a few days after
President Wendler's statement. Right?**

A. Yes.

**Q. Did any of the sponsoring organizations
also share this information, to your recollection?**

A. I do not know.

**Q. Do you recall whether Spectrum received any
inquiries from the local media -- individuals from
the local media trying to assist with fundraising?**

A. I don't think so.

**MS. BAKER: I'm going to
introduce as Exhibit 13 a screenshot
stamped SPECTRUM 1533.**

(Deposition Exhibit 13

marked for identification.)

BY MS. BAKER:

**Q. I will start from the top -- actually, I'm
going to drop this in the chat. That may make it**

1 easier.

2 I'll also continue to share it on my
3 screen.

4 Were you a part of this conversation,
5 Barrett?

6 A. Yes. I believe so.

7 Yes.

8 Q. Take a moment to read it if you need.

9 (Document review.)

10 A. All right.

11 BY MS. BAKER:

12 Q. Do you remember the context of this
13 exchange between you and Dr. Drumheller?

14 A. We were needing to go and pay for the park
15 reservation to be able to -- that was the
16 alternative venue we found was possibly through the
17 parks, so we needed to go to the park office and pay
18 them for the reservation, and we needed to have a
19 check.

20 We didn't have the -- it needed to be
21 a banker's check and not through the checkbook, so
22 we had to go to a nearby branch of Wells Fargo to
23 get the banker's check.

24 Q. I'm going to scroll down to a message that
25 I think he sent on March 30th. And it says -- this

1 top message says: "Trayvon Gay from ABC, trying to
2 find a Spectrum student to interview about show and
3 fundraising, if anyone wants to talk to him."

4 Did you receive -- do you recall
5 receiving inquiries from local media offering to help
6 spread the word about Spectrum and its fundraising
7 efforts?

8 A. I do remember this conversation, and I
9 would say yes.

10 But all of it had to go through either
11 Drumheller first, and then to, as the message says,
12 to vet.

13 Q. Are you aware if Spectrum received any
14 large donations from outside organizations or news
15 associations or affiliates?

16 A. I don't remember specifics.

17 I know that a lot of the donations
18 went through GoFundMe, and our officer, Kay, was in
19 charge of that.

20 Q. Do you recall how much you made through the
21 GoFundMe?

22 A. I remember it was a large amount. I can't
23 tell you the exact amount.

24 My ballpark guess was around
25 \$9,000-ish.

1 Q. Was that a lot more than you expected?

2 A. To the GoFundMe? Yes.

3 Q. Do you recall whether any local businesses
4 or organizations offered to provide donations to
5 support Spectrum as it was finding and transitioning
6 to an alternative venue?

7 A. I'm not too positive about specifically
8 donations.

9 I do know that we received offers for
10 certain places to act as venues for us.

11 Q. Can you tell me a little bit more about
12 that?

13 A. Sure. There is the 806 Coffee Bar in
14 Amarillo. And they offered to be a venue for the
15 show, but it was too small of a space for us to be
16 able to host everyone who had informed us they
17 wanted to go.

18 And I believe there was the 212, which
19 is the gay drag bar. But that would have restricted
20 it to everyone being over the age of 21, like,
21 regardless; nothing else. And so that one also
22 didn't suit our purposes.

23 And I believe there was one more, but
24 I can't remember the name of it.

25 Q. Who helped you-all find the venue that you

1 ultimately ended up having the show at?

2 A. At Sam Houston park? I don't remember who
3 suggested it, because we were looking at alternative
4 venues. But someone brought up the idea of renting
5 a public park. And so we looked into that, and
6 that's what made us decide on Sam Houston.

7 MS. BAKER: I will introduce as
8 Exhibit 14, a document labeled
9 SPECTRUM 1458.

10 (Deposition Exhibit 14
11 marked for identification.)

12 MS. BAKER: I will also drop it
13 in the chat for ease of review.

14 BY MS. BAKER:

15 Q. Let me know when you've read enough of it
16 to have a sense of context.

17 (Document review.)

18 A. All right. Is there any more to it?

19 Could you scroll? Thank you.

20 (Document review.)

21 A. Okay.

22 BY MS. BAKER:

23 Q. So I want to ask you about this first
24 message from Chip Chandler. He says the Bad Magic
25 folks are donating their sound system and a

1 technician.

2 A. Yes.

3 Q. So for the show, Spectrum was able to make
4 use of a donated sound system and technician --
5 technician services. Correct?

6 A. That is correct.

7 Q. Were there any other pieces of equipment,
8 to your recollection, that were donated for the
9 show?

10 A. Give me a second.

11 Someone donated their inflatable toy
12 guitar for the show for a performance. And I don't
13 remember if there are others.

14 Q. I'm going to scroll down a little here.
15 And he's discussing rehearsal. Is this rehearsal
16 related to the Sam Houston drag show?

17 A. Yes. I think so.

18 Yes.

19 Q. Can you talk about those rehearsals with
20 me?

21 A. Sure. We asked for help with K-Pop, who
22 has a rented dance room in the Virgil Henson
23 Activity center, if we could use their space to
24 practice parts of the drag show.

25 And so we would go up to the room, we

1 would practice with our music and, if we could,
2 walking in heels to get better if we had heels to
3 wear. And then Chip offered for them to come watch
4 one of our practices and help give pointers.

5 Q. So during these practices, each performer
6 was prepping for his or her individual routine. Is
7 that correct?

8 A. That is correct.

9 Q. So did you have to review all of the
10 performances before they were set to go before the
11 audiences?

12 A. All of the ones that were the student
13 performers. Yes.

14 Q. So you preapproved the student performers.
15 Correct?

16 A. Yes.

17 Q. But you did not preapprove the nonstudent
18 performers.

19 A. At the Sam Houston show, that is correct.

20 Q. Why?

21 A. It was a, like, one-week turnaround is what
22 it felt like. We were all running on fumes along
23 with our classes, and we were accepting help
24 wherever we could get it. And so we had a few spots
25 we needed to fill in to make the show longer, and so

1 we accepted them.

2 Q. So does that mean you didn't -- did
3 Spectrum know what the nonstudent performers were
4 going to do once they got on the stage?

5 A. Not fully, no.

6 Q. Did anyone know?

7 A. The performers that performed their show
8 bit -- or their performances.

9 Q. And this was an event that was promoted on
10 campus. Correct?

11 A. The information about the Sam Houston was
12 distributed on WT campus for the purpose of hosting
13 it at Sam Houston.

14 Q. And there were WT students in attendance,
15 to your recollection?

16 A. I believe so. Yes.

17 Q. Did Spectrum receive any donations, aside
18 from the funds placed in the GoFundMe account?

19 A. No. I don't think so.

20 Well, there was the PASO Turnover
21 event that we helped -- where we did help with them
22 and stuff. And our -- that was after the drag show,
23 though, I believe.

24 And I do know that because of -- we
25 were able to help them with running their charity

1 drag show, they gave us thanks. And then when we
2 asked if they had any donations possible for
3 Spectrum -- this was before the 2024 drag show, I
4 believe -- they donated an amount. And I can't
5 remember the exact amount.

6 **Q. Was the Sam Houston drag show promoted as**
7 **being a PG-13 event?**

8 **A. I believe that's what we tried to do. Yes.**

9 **Q. What do you mean by you "tried to do"?**

10 **A. That's what we told people that that's what**
11 **we were putting on was a PG-13 show, and that it**
12 **was -- we were going to try and keep the same rating**
13 **as we were doing it on campus, but we didn't have as**
14 **much control over it as we did for the on-campus**
15 **stuff.**

16 **Q. So it was a PG-13 event, even though**
17 **Spectrum wasn't aware what some of the performances**
18 **were going to be. Right?**

19 **A. That is correct.**

20 **We did inform the drag help that was**
21 **going to come and fill in the spots that we would**
22 **like it to be a 13 -- or a PG-13 show.**

23 **Q. And was this an event where minors were**
24 **permitted to be present?**

25 **A. Well, there wasn't much we could do about**

1 it, being a public park, open to the public. So we
2 didn't have control over who came and watched the
3 show.

4 Q. Why did Spectrum advertise this as a PG-13
5 event with the knowledge that it didn't have control
6 over whether it was going to be able to confirm that
7 information?

8 A. We promoted it as a PG-13 event because
9 that's what -- at least all of the student
10 performers that were going to be performing knew
11 about and what the drag queens we informed knew
12 about.

13 Q. But you also lost --

14 A. Sorry.

15 Q. Go on.

16 A. It was just that that was the information
17 we put out there and believed would be followed.

18 Q. And you all lost some performers when you
19 made the transition to Sam Houston. Correct?

20 A. That is correct.

21 Q. And how did you find replacement
22 performers?

23 A. We asked through Chip Chandler if he knew
24 if any could come and help fill out spots. And we
25 also asked Myss Myka if she knew anyone who could

1 I -- I don't know.

2 I don't know why I don't know.

3 Q. In the aftermath of President Wendler's
4 March 23rd email, Spectrum issued some public
5 statements concerning President Wendler's email. Is
6 that accurate?

7 A. Yes.

8 MS. BAKER: I'm going to
9 introduce as Exhibit 15 a document marked
10 SPECTRUM 1183.

11 (Deposition Exhibit 15
12 marked for identification.)

13 BY MS. BAKER:

14 Q. Do you recognize this statement, Barrett?

15 A. Give me a second.

16 (Document review.)

17 A. Yes. I believe so. I do recognize it.

18 BY MS. BAKER:

19 Q. And this is -- is this Spectrum's official
20 statement -- part of its official statement in
21 response to --

22 A. Yes.

23 Q. -- the decision?

24 A. Also -- sorry. Real quick.

25 My phone is about to die. It's at

1 5 percent. Let me charge it real quick -- or plug
2 it in.

3 (Pause in proceedings.)

4 BY MS. BAKER:

5 Q. Have you had a chance to review this?

6 A. Yes, I have.

7 Q. And you said you recognize this?

8 A. Yes, I do.

9 Q. Do you recall whether this was posted on
10 Spectrum's Instagram page?

11 A. I believe it was. Kay was in charge of
12 that.

13 Q. And it would reflect Spectrum's official
14 position on the controversy surrounding the drag
15 show. Right?

16 A. Yes. I believe so. Yes.

17 Q. The third sentence in this paragraph says:
18 "Drag is a celebration of many things; queerness
19 gender, acceptance, love, and especially
20 femininity."

21 A. Yes.

22 Q. Do you agree with that statement?

23 A. Yes, I do.

24 Q. What, in your view, makes drag a
25 celebration of gender?

1 A. So in my view, drag is about, like,
2 breaking gender norms and what we perceive as, like,
3 masculine and feminine, and everything in between.

4 And so the idea is that when you are
5 breaking these gender roles and showing that, like,
6 society, you can see that there is much more beyond
7 just being man or female or in between. The --
8 we're all just people, if that makes sense.

9 Q. So is it your view that drag challenges the
10 idea that gender is fixed?

11 A. Yes.

12 Q. And drag, in your view, suggests or allows
13 people to express the idea that gender is fluid. Do
14 you agree with that?

15 A. Yes. I do agree with that.

16 Q. The line immediately -- well, before I move
17 on to that.

18 Do you agree that drag is a celebration
19 of femininity?

20 A. I believe it can be, yes.

21 Q. Why do you say it can be?

22 A. Well, because not every person who is in
23 drag is a drag queen. We -- there's also the
24 inverse, where you have female performers as drag
25 kings or nonbinary performers as drag royalty. So

1 it's not -- it's not always specifically femininity;
2 it's just the baseline case of what you expect drag
3 to be is a celebration of femininity.

4 Q. When fraternities dress up as women for
5 pageants, is that -- would that be considered drag?

6 A. I would say it can be. It really depends.

7 Q. The line immediately above that says:
8 "Drag is not a mockery. It is a celebration."

9 In your view, are there any times when
10 drag could be used as a mockery?

11 MR. MORRIS: Objection. Asked

12 and answered.

13 A. I'm sorry. What was that?

14 BY MS. BAKER:

15 Q. My question to you is, do you believe there
16 are instances in which drag could be used to mock
17 others?

18 MR. MORRIS: Same objection.

19 A. I do believe there are instances where drag
20 can be used to mock others.

21 BY MS. BAKER:

22 Q. What's an example?

23 A. A drag queen dressing up as Donald Trump.

24 Q. And what would make that a mockery?

25 A. In the sense that when they dress up as

1 Donald Trump and start impersonating his ideas for
2 comedic relief.

3 Q. Isn't parody part of drag?

4 A. Yes. Parody is part of drag.

5 Q. Would you say that reasonable people can
6 disagree as to whether drag mocks others?

7 A. I would say it depends on the context of
8 the show or the performance itself.

9 Q. In what way?

10 A. There can be performances that are more
11 along the lines of the -- like being elegant and
12 boisterous and in that sense. And then there are
13 ones that are Elsa singing along to Frozen, but she
14 has bowel issues. And that's making fun of both the
15 song "Let It Go" and Frozen, while still being
16 considered drag.

17 Q. So you talked about this earlier, and I
18 want to clarify. Drag -- in your understanding, the
19 message of drag depends on what the performer is
20 trying to convey. Is that accurate?

21 A. Yes.

22 Q. So would you agree that there is really no
23 inherent message to drag; it's just whatever the
24 performer wants?

25 A. No.

1 I would say there is still the
2 inherent message of it being, like, gender-bending
3 and breaking the gender norms in that same sense,
4 while also being able to convey the performer's own
5 personal message.

6 Q. Is it still gender-bending if it is a
7 biological or cisgender woman or man dressed up as a
8 woman or a man --

9 A. -- as their --

10 Q. -- is that still gender-bending?

11 MR. MORRIS: Objection --

12 A. -- as their drag counterpart?

13 THE STENOGRAPHER: Excuse me. We
14 had a little crosstalk.

15 Mr. Morris, go ahead with your
16 objection, and I'm going to have the
17 witness answer.

18 MR. MORRIS: Yes, ma'am.

19 Objection. Vague and compound.

20 A. I -- yes. I do believe it is still either
21 playing into or breaking the stereotypical gender
22 norms.

23 BY MS. BAKER:

24 Q. How so?

25 A. You could have a straight man performing as

1 a drag king. But instead of it being him as him on
2 stage, he creates a character that personifies what
3 is stereotypically considered male. He will either
4 be, like, suave and, like, masc- -- extra masculine
5 to the point, or it could bend to the point where
6 it's still male but he has a lot more feminine,
7 like, design attribute character parts, if that
8 makes sense. Like, wearing earrings, heavily made
9 up both for the super-masculine and the feminine
10 masculine.

11 Q. So would it be fair to compare a drag show
12 to something like a pageant?

13 A. Some drag shows are very pageant-like; some
14 are just a string of performances.

15 Q. Are you aware that -- strike that.

16 Some have compared drag to blackface.
17 Do you think that's a fair comparison?

18 A. I do not think that is a fair comparison.

19 Q. Why not?

20 A. One, which is the blackface compares -- you
21 typically have, from what I know, white men putting
22 on super-inflated stereotypical features, and then
23 playing it out as a mockery of the black race, while
24 I believe that drag is more focused on the what's
25 kind of wrong with society in a sense, at least from

1 our perspective -- my perspective dealing with
2 gender. And then bending it and breaking it as
3 compared to making fun of and belittling others.

4 Q. So from what you've just said, would you --
5 is it your position that blackface is inherently
6 mockery, while drag is not inherently mockery?

7 A. Yes.

8 Q. And do you think it's unreasonable for
9 people to believe that both drag and blackface are
10 mockery?

11 A. In my opinion, I do believe that there are
12 people out there who do both believe that they are
13 both mockeries in their entirety. I also believe
14 that they -- I don't think they have a full
15 understanding of what drag is.

16 Q. So it sounds to me like sometimes you can't
17 get the full message of drag unless someone kind of
18 explains it to you. Would you agree with that?

19 MR. MORRIS: Objection.

20 Mischaracterizes prior testimony.

21 A. I believe that that can be the case
22 sometimes.

23 BY MS. BAKER:

24 Q. And when would it not be the case?

25 A. When you -- art is up to the person when

1 decided to issue any statements.

2 Q. Does that undermine your belief that the
3 school endeavors to treat all people equally?

4 A. Yes.

5 Q. Based on your reading of this letter, if a
6 student group tried to put on a blackface show,
7 would President Wendler allow it?

8 MR. MORRIS: Objection. Calls
9 for speculation.

10 A. Based on the reading of the letter, that is
11 what he says; that he would not allow it.

12 BY MS. BAKER:

13 Q. Is there anything in this letter that leads
14 you to believe another student organization with
15 different -- let me put it a different way.

16 Is there anything in this letter that
17 leads you to believe that if another student
18 organization, aside from Spectrum, tried to host a
19 drag show that President Wendler would allow it to go
20 forward?

21 A. There is not anything in that letter that I
22 saw that would -- that President Wendler would allow
23 another student org to go through with a drag show.
24 I don't believe he would.

25 Q. And would you agree that part of the

1 message of Spectrum's drag show was to show support
2 for The Trevor Project?

3 A. Yes. That was part of the message.

4 Q. And would you agree that that message is
5 echoed in this letter?

6 MR. MORRIS: Objection. Vague.

7 A. I'm sorry?

8 BY MS. BAKER:

9 Q. Do you see anything in this letter that
10 praises the work of The Trevor Project?

11 A. Yes. Near the end, it states that "You
12 should still donate to The Trevor Project."

13 And at the beginning, he states that
14 The Trevor Project is an ideal goal to donate to.

15 Q. So does anything in this -- does anything
16 in this statement ...

17 Does anything in this statement express
18 a disagreement with the message of Spectrum's 2023
19 drag show?

20 A. I would say yes. Specifically, him
21 disregarding -- not disregarding -- stating that
22 drag is misogynistic and goes against the principles
23 of women and femininity.

24 Q. And you say that statement -- that
25 statement contradicts the message of the drag show?

1 putting forward the drag show, it was, like, should
2 it go through and everything gets accepted and fine.
3 And even if there were protests, just the support
4 shown from the community showing that we were
5 accepting and open to the LGBTQ+ community and
6 culture shows that it's -- it will make them feel
7 much safer on campus.

8 Q. So is your position that -- is your
9 position that -- strike that.

10 Is it your position that an
11 individual's -- an individual's disagreement with
12 drag constitutes a rejection of the LGBTQ+ community
13 members?

14 I don't want to put words in your
15 mouth; I'm asking you to clarify.

16 A. I do not believe necessarily that being
17 against drag means that you're against the LGBTQ+
18 community. But when you use being against drag as
19 the reason to shut down, like, LGBTQ -- or the drag
20 show, then that does feel like an affront to the
21 LGBTQ+ community. If that makes sense.

22 MS. BAKER: I'm going to stop
23 sharing.

24 BY MS. BAKER:

25 Q. To your recollection, has there been any

1 other event that Spectrum has hosted that
2 President Wendler has stopped from going forward or
3 in any way -- either President Wendler, WT staff.

4 Has there ever been an instance where
5 they have prevented Spectrum from carrying on with
6 its events?

7 A. I will say, yes, kind of.

8 There was The Rocky Horror Picture
9 Show we were trying to put on and do a -- and have,
10 like, the -- not the, like, shadow cast section, but
11 with, like, the bits and the props with the -- that
12 go along with the movie. But we weren't able to
13 host it, because to go through the university, we
14 would have to get screening rights for the movie,
15 and that was too expensive. And that's what the
16 university informed us why we weren't allowed have
17 it, unless we paid for -- the price for the
18 screening, which we weren't able to.

19 Q. So the -- that event not going forward was
20 about screening rights. Correct?

21 A. That is correct.

22 Q. It wasn't something that the university in
23 any way prohibited you from hosting on campus if you
24 wanted. Correct?

25 A. That is correct.

1 A. Yes.

2 (Document review.)

3 A. Is it repeating again?

4 BY MS. BAKER:

5 Q. Yes. Okay. But I just want to make sure
6 that you see what's in this entire document.

7 A. Got it.

8 Q. Do you recall this exchange with Dr. Fouts?

9 A. Yes, I do.

10 Q. What was the context of this conversation?

11 A. To send in the list of music to be approved
12 to go from tentative to final confirmation.

13 Q. So the JBK staff was provided with a list
14 of songs that Spectrum planned to use for the drag
15 show in advance. Correct?

16 A. Correct.

17 Q. And you reviewed performances for the 2023
18 drag show in advance. Correct?

19 A. Correct. Yes.

20 Q. How did you do that?

21 A. That was through the practices. And then
22 there was no presentation, because we didn't need a
23 PowerPoint running behind the performance.

24 Q. So the presentation would have been a
25 PowerPoint?

1 A. That's what I got away from the email,
2 asking if we needed a presentation to go with the
3 performers.

4 Q. Did you tell the performers to make sure
5 that they kept it PG-13 --

6 A. Yes.

7 Q. -- in terms of their dances?

8 A. Yes.

9 Q. And did you-all have a discussion about
10 what that meant?

11 A. We did not have a specific discussion about
12 what "PG-13" meant.

13 Q. But you just trusted the performers'
14 judgment. Right?

15 A. That is correct.

16 Q. I'm going to scroll to your email. Okay.
17 Here it is.

18 It's from March 17th. You said, "Some
19 of the performers have not sent a specific song yet."

20 Was that because some of the performers
21 were still developing their routine?

22 A. Some of them still had songs that they were
23 wanting to look at. Yes.

24 Q. So they were still developing their routine
25 at that point?

1 to run through.

2 Q. What do you mean you were waiting on a few
3 of them?

4 A. For the songs. Specifically, we got the
5 songs in, and then it was spring break. And we
6 were -- or just after spring break. So we were
7 going to start double-checking everything, and that
8 was when the show got canceled.

9 Q. So the JBK reviewed the songs that Spectrum
10 planned to use, but it didn't review the
11 performances. Is that correct?

12 A. That is correct.

13 Q. Would you agree that the JBK trusted your
14 judgment as to what was considered PG-13?

15 A. Yes.

16 Q. And what criteria did you consider?

17 A. For what is PG-13?

18 Q. Yes.

19 A. I considered whether there was cuss words
20 in the music; we were trying to keep it cuss word.
21 Even though that doesn't necessarily fall within the
22 purview of PG-13, we were trying to keep it our --
23 as conservative as possible to avoid backlash where
24 we could.

25 And so that would include certain

1 dances, if that makes sense, that might not be
2 acceptable for the PG-13 rating. And so we were
3 looking -- making sure that we didn't have, like,
4 those types of things.

5 Q. So it was more of just -- was it you and
6 someone else making this -- making these judgment
7 calls, or was it only you?

8 A. It was me and a few others that I
9 consulted.

10 And PG-13 was more of a guideline, if
11 that makes sense.

12 Q. Explain what you mean by "guideline."

13 A. In the sense that it's kind of hard to
14 define what stands as PG-13. We were going off of,
15 like, what you would expect for a PG-13-ish movie,
16 but we were trying to keep it where there would be
17 no explicit sex style of scenes or anything like
18 that. There was going to be no cuss words; it was
19 just going to be dancing and lip syncing in drag to
20 the music.

21 Q. Were there ever any disagreements among you
22 and the other individuals who helped you make these
23 decisions about whether a performance was kind of on
24 the line and maybe not going to be appropriate?

25 A. I can't remember exactly.

1 A. And I would say that is what the document
2 says.

3 Q. So would you agree that the JBK center is
4 limited to groups and events that comply with the
5 university's mission and policies?

6 MR. MORRIS: Objection. Calls
7 for speculation.

8 A. I would say that is what the document says.

9 BY MS. BAKER:

10 Q. Do you see anything on this document that
11 suggests that JBK can only cancel an event if they
12 have first received a complaint concerning that
13 event?

14 A. I do not see that.

15 Is it stated in the document?

16 Q. It is not plainly stated in the document,
17 but I want you to make your -- I don't want to put
18 words in your mouth.

19 A. I would not know if -- about that, then; if
20 they're allowed -- if they're allowed to cancel an
21 event based off of a complaint.

22 Q. But you don't see any language that plainly
23 states that only events that have been complained
24 about can be canceled. Correct?

25 A. I do not see that in the document.

1 Q. Do you see anything -- do you see anything
2 there that suggests events that have received
3 initial approval cannot be interrupted?

4 A. I do not see that in the document.

5 Q. Do you see anything in the document to
6 suggest that events that have received initial
7 approval cannot be canceled?

8 A. I also do not see that in the document.

9 Q. The document -- the document states that
10 the JBK can cancel events for noncompliance with the
11 university policies. Correct?

12 A. That is correct.

13 MS. BAKER: I'm going to move to
14 introduce Exhibit 19. Exhibit 19 is a
15 document spanning from SPECTRUM 3824
16 through SPECTRUM 3826.

17 (Deposition Exhibit 19
18 marked for identification.)

19 BY MS. BAKER:

20 Q. Did you ever visit this website in planning
21 the event?

22 A. I can't say if I have or haven't.

23 I have seen this website web page
24 before, but I'm not sure if I ever fully read it in
25 the sense of trying to move in to the next, like,

1 tabs there on the left side.

2 Q. Let's take a look at the mission statement.

3 Based on your reading of the mission
4 statement, would you agree that the JBK student
5 center is a gathering place, a place for all WT
6 students?

7 A. That is correct.

8 Q. Is there any language in particular there
9 that makes you say that?

10 A. "The Jack B. Kelley Student Center is a
11 gathering place for the entire West Texas A&M
12 University."

13 Q. And in your experience as a WT student,
14 would you say a lot of student activities happen
15 there?

16 A. Yes.

17 Q. Like what?

18 A. I know that a lot of tabling happens in the
19 commons of the JBK, and quite a few student orgs
20 have their meetings in the JBK in rented rooms
21 downstairs.

22 Q. And you've mentioned that even Spectrum has
23 used the JBK for tabling and speaking to students.
24 Right?

25 A. That is correct.

1 Q. Has it used the JBK for any other events?

2 A. We used the JBK for National Coming Out
3 Day, and we attempted to use it for Rocky Horror
4 before that fell through.

5 Q. And that falling through was, again,
6 related to the licensing issue --

7 A. Yeah. Right.

8 Q. -- is that correct?

9 And you said you hosted the National
10 Coming Out Day celebration or event in the JBK.
11 Right?

12 A. That is correct.

13 Q. What was that like?

14 A. We had two events that I can remember. One
15 was headshot day, which was in the commons where we
16 had the big Polaroid printout thing with the "I am
17 gay", "I am queer," "I am lesbian" sticker thing for
18 people to do photos with.

19 And then the other one was we had a
20 coming out day panel in the JBK, I believe it's the
21 Congress room, where the student org- -- the student
22 government organization met and we had a panel of
23 people and we told our coming out day stories.

24 Q. Are there any other events, aside from the
25 2023 and 2024 drag shows that Spectrum has attempted

1 Def 182036.

2 (Deposition Exhibit 20

3 marked for identification.)

4 BY MS. BAKER:

5 Q. This document is a map of WT's campus. Did
6 you see any maps like this while you were a student
7 there?

8 A. Yes, I have.

9 Q. Is there any area of campus that you can
10 identify for me that either you as an individual,
11 Spectrum as an organization, or its members, were
12 prohibited from meeting or organizing or
13 experiencing as students as a result of the
14 controversy surrounding the drag shows?

15 A. I would say that we had the same access to
16 buildings, rooms, et cetera, as we did before the
17 controversy.

18 Q. And would you agree that Spectrum continued
19 to meet as normal and carry on its business as usual
20 despite the controversy surrounding the drag shows?

21 A. I would say that there were some issues and
22 hiccups that we hit along the way because of that.
23 But, yes, we were able to keep holding meetings.

24 Q. What were those issues and hiccups?

25 A. We had had -- a few members expressed

1 concern about staying in Spectrum because of the
2 controversy, and they didn't want, like, their
3 information or their family to find out about what
4 was happening at WT with possibly their involvement.
5 And a few of our meetings became chaotic because of
6 the controversy dealing with the drag show.

7 Q. So just to clarify, you say -- you agree
8 that there's no place on this campus that you were
9 prohibited from entering or lost privileges to as a
10 student -- as a registered student organization, as
11 a -- excuse me -- following the drag show
12 controversies?

13 A. That is correct.

14 As a student and as a student org, we
15 did not lose access to any spaces because of the
16 university's controversy.

17 Q. But you did say that some members felt
18 very -- they felt very uneasy and somewhat
19 unwelcomed on campus as a result of this decision?
20 Is that -- am I --

21 A. Yes.

22 Q. -- am I misunderstanding?

23 A. No. That is correct.

24 Q. And why is that?

25 Why did they feel that way?

1 A. I -- some of them were worried about their
2 name getting out on the news and their parents
3 finding out that they were part of the LGBTQ
4 community because of the controversy, and was
5 worried about staying in Spectrum because of that.

6 Others said that they felt unsafe.
7 They didn't necessarily tell me the reason why. And
8 I know another person sent an email to the student
9 body government about their decision, talking about
10 the drag show where they -- the person said the
11 email explained why they felt unsafe. I don't
12 remember the exact contents of that email.

13 Q. Is there any -- are there any privileges
14 that other student organizations -- any privileges
15 or spaces that other students, student
16 organizations, make use of that Spectrum hadn't been
17 able to?

18 A. Not that I know of.

19 Q. And do you have reason to believe that WT
20 has selectively enforced its policies, and
21 Spectrum -- against Spectrum in a way that it
22 wouldn't enforce them against another student
23 organization?

24 A. I will say that we only got notice about
25 the no drag show stuff after we tried to put it on,

1 but know of other student orgs that have put on
2 similar-ish events or -- in maybe the same kind of
3 vein type of events that didn't get canceled.

4 But that could also just be because of
5 the publicity of our event, but I am not too sure.

6 Q. Okay. I want to -- we talked about the
7 Sam Houston drag show earlier, but I do want to jump
8 back to that to get clear on a few points hereby.

9 Did you pay any out-of-pocket expenses
10 to secure the park?

11 A. Spectrum out-of-pocket, or my personal
12 out-of-pocket?

13 Q. Personal.

14 A. No. Not my -- not that I remember.

15 Q. And the expenses that Spectrum paid were
16 eventually covered by donations. Right?

17 A. That is correct.

18 Q. Would you agree that the Sam Houston drag
19 show was a successful event?

20 A. Yes. I would agree.

21 Q. And a lot of people turned out to that
22 event. Right?

23 A. That is correct.

24 Q. And you would say it was more people than
25 you even expected. Right?

1 A. That is correct.

2 Q. Would you say it was the largest or best
3 attended Spectrum event that you've ever been to?

4 A. That is correct.

5 Q. Were there any admission costs?

6 A. There were not.

7 Q. Why not?

8 A. Because it was an open park and we didn't
9 have a way to restrict people from entering the
10 park. And so it was -- there was no way to charge
11 an admission cost, so we did not charge an admission
12 cost.

13 Q. And students just needed their IDs to --
14 did students need their IDs to get in, or could they
15 just walk in with it being an open park?

16 A. They could just walk in with it being an
17 open park.

18 Q. And you performed during that show. Right?

19 A. That is correct.

20 Q. And would you say the nature of the
21 performances that happened that evening are similar
22 to what audience members or students would have seen
23 if it had been able to go through at Legacy Hall?

24 A. Yes. But the student performers did --
25 would have been similar to what would have happened

1 at Legacy Hall. We would not have had the
2 professional drag queens and their performances at
3 the one at Legacy Hall.

4 Q. And I know you mentioned that you all lost
5 some performers; some of the drag queens stepped in
6 and helped. Did -- did they help in any other
7 capacity during the show?

8 A. Yes.

9 We -- Buff Allies did our face makeup
10 for me and a few of the other drag performers. And
11 then we got final touch-ups and help with the makeup
12 at the venue before we put on the show.

13 Q. And then in the period where you were --
14 where Spectrum was trying to assess how it was going
15 to get enough performers to put on a good show for
16 everyone, did you-all receive different inquiries
17 from various different performers asking to
18 participate?

19 A. I believe we received some, but I don't
20 remember who asked. And I also don't remember who
21 was in charge of making -- of checking who asked, if
22 that makes sense.

23 Q. So are you aware of what criteria was
24 assessed or used in confirming who was -- which of
25 those performers was going to be selected versus

1 which were going to be turned away?

2 A. I did not -- I don't remember about the
3 criteria, if there was a criteria; and I wasn't in
4 charge of it at that point.

5 Q. How would you describe the audience that
6 night during the Sam Houston drag show?

7 A. From on stage, the audience seemed
8 ecstatic.

9 Q. Were the performers very interactive with
10 the audience members?

11 MR. MORRIS: Objection. Vague.

12 A. I would say it was hard to tell from the
13 wings.

14 I know that my performance, I mainly
15 stayed on stage and, at most, like, collected tips
16 from the edge of the stage.

17 And I know that during Henry's
18 performance as Henrietta, there were -- he had a few
19 backup dancers come on stage with him. But I don't
20 know about the rest, as I was in the wings.

21 BY MS. BAKER:

22 Q. And other -- the other performers were
23 collecting tips too. Right?

24 A. That is correct.

25 Q. And the audience members were going up and

1 **handing them tips. Right?**

2 A. That is correct.

3 **Q. What became of the tips?**

4 A. They were all collected and counted and
5 then added to the donation pool for The Trevor
6 Project. And there were a few \$2 bills that were
7 kept as, like, little, tiny remembrance things for
8 the show.

9 **Q. Were any of the performers paid?**

10 A. No.

11 **Q. So because it was a public park, Spectrum**
12 **didn't attempt to really enforce the policy that**
13 **only -- that only minors with a parent or guardian**
14 **could attend. That wasn't really enforced.**
15 **Correct?**

16 A. We weren't able -- oh.

17 MR. MORRIS: Objection.

18 A. We weren't really able to enforce it. We
19 didn't have the means to block off the park.

20 BY MS. BAKER:

21 **Q. So it would have taken you being -- it**
22 **would have taken Spectrum being in an enclosed space**
23 **to verify that information?**

24 A. Yes.

25 **Q. So why did Spectrum attempt to host its**

1 Q. What do you mean by your "run-through"?

2 A. We would have a run-through with just as --
3 without, like, all of the stuff on as a dry run.
4 And then we'd do another run-through with everyone
5 in makeup and costume or dress and stuff. Run
6 through it with the music and the heels and make
7 sure everything's going good, and then we'll put on
8 the show after that run-through with people coming
9 in after the second one was done.

10 Q. And to your remembrance, were there -- and
11 in addition to the student groups, were there also
12 drag performers that were going to be involved in
13 this show?

14 A. I don't remember. I can't -- I can't
15 recall.

16 I know the names we received were
17 from -- at least from AC were from AC's LGBTQ+
18 group.

19 Q. But Spectrum at that point did have some WT
20 students who were signed up to be performers.
21 Correct?

22 A. Yes. That is correct.

23 Q. Do you recall whether some of the
24 professional drag performers were helping or
25 assisting or providing lessons to student

1 **communications?**

2 A. It was pertaining to the cancellation of
3 the drag show, how I wasn't sure if we were going to
4 be able to move it off campus because it was my
5 senior year and I was already neck deep in 1 million
6 things. And I can't remember if we talked about
7 anything else.

8 **Q. Do you recall whether any faculty or staff**
9 **attempted to help Spectrum find an alternative**
10 **venue?**

11 A. I believe we probably received some, but I
12 don't remember which venues offered -- or were
13 proposed.

14 **Q. Did you communicate with Chip Chandler?**

15 A. Yes.

16 **Q. Do you recall whether he proposed any**
17 **particular venues or sites?**

18 A. I don't remember if he proposed one for the
19 2024.

20 I know that he proposed some for the
21 2023 show, but I'm not sure if I remember if he
22 proposed one after the 2024 cancellation.

23 **Q. So what became of Spectrum's 2024 drag**
24 **show?**

25 **A. After the cancellation, it fell apart. We**

1 weren't able to find an alternative venue. There
2 was some -- there was poor communication between us
3 and the other performers, and I was too busy trying
4 to graduate to help lead it. And I know that
5 everyone else was also really, really busy at that
6 same time, so it just fell apart and didn't
7 continue.

8 MS. BAKER: I'm going to
9 introduce as Exhibit 23 a document marked
10 SPECTRUM 2647.

11 (Deposition Exhibit 23
12 marked for identification.)

13 BY MS. BAKER:

14 **Q. If you'd like to read this entire thing, I**
15 **can scroll to give you the full context.**

16 (Document review.)

17 A. Okay.

18 BY MS. BAKER:

19 **Q. Do you now remember the context of this**
20 **conversation?**

21 A. Yes. The first half was trying to find
22 alternative venues, asking around for what was
23 available. And then I asked him about the
24 Sunset Center, which is a down -- or an Amarillo
25 center where PASO has their charity drag show. And

1 Q. And what exactly would that have meant?

2 What does the rollover mean?

3 A. The idea was, on Eventbrite, we would have
4 changed the name, location, and date. And if anyone
5 wanted to keep their tickets, we would just move
6 that over onto the new Eventbrite. And anyone who
7 wanted a refund, we would refund.

8 Q. Are you aware of any future or ongoing
9 plans by Spectrum to host a drag show on campus at
10 WT?

11 A. Not that I'm currently aware of.

12 MS. BAKER: Okay. That's all I
13 have for you. Thank you.

14 MR. MORRIS: Just a few questions
15 for you, Mr. Bright, from me.

16 EXAMINATION

17 BY MR. MORRIS:

18 Q. You testified earlier a little bit about
19 Spectrum losing access to spaces on campus that
20 other RSOs have access to. Do you recall that?

21 A. Yes.

22 Q. Can you explain whether or not Spectrum has
23 ever lost access to Legacy Hall?

24 A. We did lose access to Legacy Hall for the
25 drag show that we were planning.

1 Q. Okay. That was the 2023 drag show?

2 A. Yes. That is correct.

3 Q. Could you explain, would your answer be the
4 same for the 2024 drag show?

5 A. Yes. It would be the same.

6 Q. Okay. When you were planning the 2023 drag
7 show for Legacy Hall, did anybody -- any staff or
8 administration with WT raise any concerns about WT
9 students who were under the age of 18 attending the
10 show?

11 A. Yes. We -- I believe it was -- Drumheller
12 did raise concerns about that. And that was when we
13 decided to do the access with the student ID card,
14 or you would need to be above the age of 18 with --
15 or have a legal guardian with you.

16 Q. And did that satisfy Dr. Drumheller's
17 concerns?

18 A. Yes.

19 Q. Did anybody from the JBK center staff,
20 including Dr. Fouts, raise any concerns about WT
21 students under the age of 18 attending the show?

22 A. Not that I can remember.

23 Q. Okay. If so, can you explain, would you
24 have worked with them to alleviate their concerns?

25 A. Yes. That is correct.

1 Q. Okay. During the time you were planning
2 the drag show as Legacy Hall, did any JBK center
3 staff raise concerns about students feeling
4 embarrassed or harassed by the drag show?

5 A. No, they did not.

6 Q. Can you explain, did Spectrum reach out to
7 any minors to attend the show, other than siblings
8 or family members?

9 A. No, we did not.

10 Q. Okay. Did JBK staff, or any other employee
11 of WT, ever raise concerns about the 2023 drag show
12 violating any university policy?

13 A. They did not.

14 Q. Okay. What about for the 2024 drag show?

15 A. They did not, as well.

16 Q. If -- you testified earlier that you and
17 other members of the officer corps for Spectrum
18 reviewed performances before the planned show at
19 Legacy Hall. Is that right?

20 A. That is correct.

21 Q. Okay. If after reviewing the performance
22 it didn't meet Spectrum's understanding of what a
23 PG-13 performance would be, what would Spectrum have
24 done?

25 A. We would have asked them to change it. If

1 it's just the music, then change the music. If it
2 was part of the performance, we would ask them to
3 either change or tweak that part of the performance
4 to, then, fit within what we believed was
5 acceptable.

6 Q. Okay. And you testified earlier you've
7 attended drag shows. Correct?

8 A. That is correct.

9 Q. Okay. And you explained to Ms. Baker how
10 sometimes you might not readily understand what a
11 performer is trying -- is intending to convey. Is
12 that right?

13 A. That is correct.

14 Q. Can you explain whether or not, as somebody
15 who's been to drag shows, that you understand the
16 performer trying to communicate something?

17 A. Yes. They -- I always -- every drag show I
18 attend, I always feel like each and every individual
19 performer is trying to convey something. If it's
20 impersonating through Disney or, like, doing a
21 Disney song, it's to show how they are embodying the
22 character they're performing.

23 If it's for comedy, it would be trying
24 to make the audience laugh in whatever way they can.
25 And every show I've been to, there is a message to

1 each performance.

2 MR. MORRIS: Okay. That's all I
3 have.

4 Thank you, Mr. Bright.

5 (Pause in proceedings.)

6 THE STENOGRAPHER: Anything else
7 from anyone?

8 MS. BAKER: I have a few
9 follow-up questions.

10 FURTHER EXAMINATION

11 BY MS. BAKER:

12 Q. Following President Wendler's letter in
13 March of 2023, did you personally, or Spectrum as an
14 organization, communicate with any students or
15 groups who agreed with Dr. Wendler's position?

16 A. I -- following the email that went out, and
17 particularly during the protests that happened on
18 campus, I did talk to quite a few people who did
19 agree with Wendler, at least on canceling the drag
20 show.

21 Q. So you would agree that reasonable
22 people -- a reasonable person could believe that a
23 drag show is mockery?

24 A. I can't say for certain if that was the
25 reason why, but yes. I do believe that some people

1 can believe that drag is a mockery.

2 Q. And you agree that if a student
3 organization attempted to host a blackface
4 performance on campus, that would not be permitted.
5 Correct?

6 MR. MORRIS: Objection. Calls
7 for speculation.

8 A. I don't believe that Wendler would allow
9 said event to happen. However, if an event was
10 happening, I do believe the students would have to
11 protest said event happening.

12 BY MS. BAKER:

13 Q. And members of Spectrum were very engaged
14 with on-campus protests. Correct?

15 A. That is correct.

16 Q. And some of those protesters were dressed
17 in drag. Correct?

18 A. That is correct.

19 Q. And none of those protestors were prevented
20 from exercising that right. Correct?

21 A. That is correct.

22 Q. And Dr. -- President Wendler nor WT did not
23 disrupt those drag demonstrations. Correct?

24 MR. MORRIS: Objection. Form.
25 Objection. Calls for speculation. Lacks

1 foundation.

2 A. I don't know if there were any attempts to
3 cancel the protests.

4 BY MS. BAKER:

5 Q. Were any of the protests that you were
6 involved in disrupted?

7 A. Not through university means.
8 I know that there were
9 counter-protesters there and then there were news
10 recordings there as well. And all of the chalk art
11 we put in and around the building were routinely
12 washed away every night.

13 Q. And Spectrum has continued to use the JBK
14 despite the controversy surrounding the drag shows.
15 Correct?

16 A. That is correct.

17 MS. BAKER: Okay. No further
18 questions for me.

19 (Pause in proceedings.)

20 THE VIDEOGRAPHER: Is that it for
21 everyone?

22 MR. MORRIS: Yes. Sorry.

23 (Proceedings concluded at 3:22 p.m.)
24
25

1 CHANGES AND CORRECTIONS

2 WITNESS NAME: BARRETT BRIGHT

3 DATE: FRIDAY, DECEMBER 19, 2025

4 Reason Codes: (1) to clarify the record; (2) to
5 conform to the facts; (3) to correct a transcription
error; (4) other (please explain).

6 PAGE LINE CHANGE REASON CODE

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1 SIGNATURE

2
3
4 I, BARRETT BRIGHT, have read the foregoing
5 deposition or have had it read to me, and hereby
6 affix my signature that same is true and correct,
7 except as noted above.

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10 _____
11 BARRETT BRIGHT
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

Civil Action Number 2:23-cv-00048

SPECTRUM WT, et al.)

Plaintiffs,)

vs.)

WALTER WENDLER, et al.)

Defendants.)

REPORTER'S CERTIFICATE

REMOTE VIDEOTAPED DEPOSITION OF BARRETT BRIGHT

FRIDAY, DECEMBER 19, 2025

I, Rebecca J. Callow, Registered Merit
Reporter, Certified Realtime Reporter, Registered
Professional Reporter and Notary Public in and for
the State of Florida, hereby certify to the
following.

That the witness, BARRETT BRIGHT, was duly
sworn by the officer and that the transcript of the
oral deposition is a true record of the testimony
given by the witness;

That the original deposition was delivered
to Alexia Baker.

That a copy of this certificate was served

1 on all parties and/or the witness shown herein on
2 December 23, 2025.

3
4 I further certify that pursuant to FRCP
5 Rule 30(f)(1) that the signature of the deponent:

6 [X] was requested by the deponent or a
7 party before the completion of the deposition and is
8 to be returned within 30 days from date of receipt
9 of the transcript. If returned, the attached
10 Changes and Signature Page contains any changes and
11 the reasons therefor;

12 [] was not requested by the deponent or
13 a party before the completion of the deposition.

14 I further certify that I am neither
15 counsel for, related to, nor employed by any of the
16 parties or attorneys to the action in which this
17 proceeding was taken. Further, I am not a relative
18 or employee of any attorney of record in this cause,
19 nor am I financially or otherwise interested in the
20 outcome of the action.

1
2 SUBSCRIBED AND SWORN TO under my hand and
3 seal of office on this the 23rd day of
4 December, 2025.

5
6 
7

8 Rebecca J. Callow, RMR, CRR, RPR
9 Notary Public, Miami-Dade, Florida
10 My Commission No. HH 409626
11 Expires: June 12, 2027
12 Integrity Legal Support Solutions
13 9901 Brodie Ln. #160-400
14 Austin, Texas 78748
15 (512) 320-8690
16 www.integritylegal.support
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